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ORIGINAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

**U.S. EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,**

Plaintiff,

v

ACRO SERVICE CORPORATION,

Defendant.

Case No. 03-73250

HONORABLE PAUL D. BORMAN
MAGISTRATE JUDGE CAPEL

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION**

Trina Mengesha (P59458)
Attorneys for Plaintiff
Patrick V. McNamara Building
477 Michigan Avenue, Room 865
Detroit, MI 48226
(313) 226-4620

THE FISHMAN GROUP

Steven J. Fishman (P13478)
Maureen Rouse-Ayoub (P46301)
Attorneys for Defendant
40950 Woodward Avenue, Suite 350
Bloomfield Hills, MI 48304
(248) 258-8700

APR 12 3 50 PM '04

FILED

DEFENDANT'S WITNESS LIST

NOW COMES the Defendant, and for its list of witnesses that it may call at the time of trial, states:

1. Ron Shahani, 17187 North Laurel Park Drive, Livonia, MI 48152.
2. Chitra Ravinder Shahani, 17187 North Laurel Park Drive, Livonia, MI 48152.
3. Keith Berg, 17187 North Laurel Park Drive, Livonia, MI 48152.
4. Paul Anthony Batistelli, 17187 North Laurel Park Drive, Livonia, MI 48152.
5. Gregory Aufschlagcr, 17187 North Laurel Park Drive, Livonia, MI 48152.
6. April Zlaska, 17187 North Laurel Park Drive, Livonia, MI 48152.
7. Leika Betty, 17187 North Laurel Park Drive, Livonia, MI 48152.
8. Janeen Cramer, last known address 6546 Fenton, Dearborn Heights, MI 48127.

9. Ian King, 2530 Dominion, Windsor, Ontario.
10. Records and/or Record Custodian, Sutton Creek Golf Course.
11. Records and/or Record Custodian, Monster Jobs. com.
12. Records and/or Records Custodian, Job Network.
13. Records and/or Records Custodian, Impact Staffing.
14. Records and/or Records Custodian, Icebox Arena.
15. Records and/or Records Custodian, Windsor Regional Hospital.
16. Dr. Sho and/or Records Custodian or Records of Dr. Sho.
17. Records and/or Records Custodian for Sears Portrait Studios, Windsor, Ontario.
18. Records and/or Records Custodian for EEOC.
19. Records and/or Records Custodian for Kelly Services.
20. Records and/or Records Custodian for Acro Service Corporation.
21. Dr. Patel and/or Records Custodian or Records of Dr. Patel.
22. Records and/or Records Custodian for Zehr's Market, Windsor.
23. Any and all medical treaters of Plaintiff identified during ongoing discovery.
24. Expert medical, psychiatric, psychological, occupational, rehabilitation, and/or mental health treaters to be identified, if necessary, to rebut Plaintiff's claims and/or refute testimony of Plaintiff's expert witnesses.
25. Expert economic, CPA, and/or finance consultants to be identified, if necessary, to refute Plaintiff's claim and/or refute testimony of Plaintiff's expert witnesses.
26. Any and all witnesses timely identified by Plaintiff.
27. All witnesses necessary to lay a foundation for any exhibit of Defendant.
28. Any and all necessary rebuttal witnesses.

29. Any and all witnesses identified during ongoing discovery.
30. Defendant reserves the right to alter, amend, and/or add to its Witness List depending upon completion of discovery.

THE FISHMAN GROUP

By Maureen Rousc-Ayoub
Maureen Rousc-Ayoub (P46301)
Attorneys for Defendant
40950 Woodward Avenue, Suite 350
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(248) 258-8700
Dated April 12, 2004

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

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ACRO SERVICE CORPORATION,

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HONORABLE PAUL D. BORMAN

MAGISTRATE JUDGE CAPEL

Defendant.

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APR 12 13:50

PROOF OF SERVICE

STATE OF MICHIGAN)
) SS
COUNTY OF OAKLAND)

Nancy E. Ryan, an employee of the law firm of The Fishman Group, being first duly sworn, deposes and says that on the 12th day of April 2004, said employee served copies of the within Defendant's Witness List upon Trina Mengesha by placing said documents in a well-sealed envelope, addressed to Patrick V. McNamara Building, 477 Michigan Avenue, Room 865, Detroit, MI 48226 and delivering said package to a U.S. Postal Receptacle located at 40950 Woodward Avenue, Bloomfield Hills, Michigan.

Subscribed and sworn to before me this 12th
day of April, 2004.

Cheryl A. Hartzler
Notary Public, Oakland County, Michigan
My commission expires: 9/7/2006

Nancy E. Ryan
Nancy E. Ryan